

### **REMARKS**

Claims 1-27 are pending in this application. By this Amendment, claim 27 is amended to correct a dependency error not previously corrected in the record. No new matter is added.

#### **I. The Claims are Patentable over the Applied References**

The Office Action (1) rejects claims 1-6, 11-14, 16 and 22-27 under 35 U.S.C. §103(a) over U.S. Patent No. 6,215,459 to Reddy in view of U.S. Patent No. 6,812,907 to Gennetten; and (2) rejects claims 7-10, 15 and 17-21 under 35 U.S.C. §103(a) over Reddy in view of Gennetten, and further in view of U.S. Patent No. 6,803,884 to Ohzawa. Applicant respectfully traverses the rejections.

The claims are patentable over the applied references because (A) one of ordinary skill in the art would not have combined the applied references as alleged; and (B) even under the alleged combination, the applied references fail to disclose "when the first image information data is displayed on the first display device and the second image information data is displayed on the second display device the resulting displayed single image appears to be substantially continuous across the first and second display areas to a viewer situated to view the image and the displayed resolution of the portion of the image displayed on the first display area is different than the displayed resolution of the portion of the image displayed on the second display area" (claim 1, claims 11 and 22 recite similar features).

Reddy discloses a dual display video controller 700 for use in driving two separate displays (Fig. 7) having different resolutions and/or refresh rates (col. 8, lines 4-6). In operation, the dual display video controller 700 stores first and second video frames of data to be displayed on the two displays (e.g., CRT 106 and flat panel 107) as either interleaved pixel data (Abstract) or as separate first and second images (col. 8, lines 6-11).

Gennetten discloses a segmented electronic display 22 for a digital camera 10, the segmented electronic display 22 having segment A 24 and segment B 26 (Figs. 2-3; col. 3, line 40 - col. 4, line 5). Only the small segment A 24 is used when displaying small items. Both segments A 24 and B 26 are used when displaying large items (col. 2, lines 29-33).

Gennetten is silent as to the relative sizes of the pixels in segments A 24 and B 26. Because Gennetten discloses that large images are displayed on both segments A 24 and B 26, that smaller images are displayed only on segment A 24, and that the design goal is to minimize energy use (col. 1, lines 5-8) and not related to different resolutions, one of ordinary skill in the art would have understood that segments A 24 and B 26 have pixels of equal size.

One of ordinary skill in the art would not have combined the applied references as proposed because (1) the disclosure of Reddy and Gennetten are not technically combinable; and (2) the proposed combination would render Gennetten's display 22 unsuitable for its intended purpose. As discussed above, Reddy's dual display video controller 700 contains circuitry to display separate images on two displays having different resolutions and/or refresh rates. Gennetten's display 22 uses a small display area for small items and two displays in tandem for larger items.

First, adding Gennetten's display 22 to Reddy's video controller 700 does not make technical sense. Reddy's video controller 700 includes DAC (digital-to-analog converter) 104 for use with CRT 106 (Fig. 7). Because Gennetten's display 22 is not a CRT and is not analog, the proposed combination of Reddy's video controller 700 and Gennetten's display 22 could not function.

Second, combining Reddy's video controller 700 with Gennetten's display 22 will render Gennetten's display 22 unsuitable for its intended purpose, and, thus, the proposed combination is improper (MPEP §2143.01(V)). Gennetten's display 22 is designed to avoid

use of one display area (segment B 26) when not needed, thus conserving energy. This is important for portable devices such as digital camera 10. Adding Gennetten's display 22 to Reddy's video controller 700, with circuitry including DAC 104, LUTs (look up tables) 730 and 732, etc. would thus render the power consumption of the proposed combination higher than with Gennetten's display 22 alone, especially considering that the circuitry for both channels of Reddy's dual display controller 700 will be active for both displays even when Gennetten's segment B 26 is not needed. Thus, the proposed combination renders Gennetten's display 22 unsuitable for its intended purpose.

Nevertheless, regarding independent claims 1, 11 and 22, even if the applied references are combined as alleged, the resulting device would not disclose the claimed features. Under the proposed combination, the resulting device would comprise Reddy's video controller 700 connected to two displays, CRT 106 and flat panel 107, and displaying images across both displays as disclosed by Gennetten. However, because Gennetten's display 22 comprises segments A 24 and B 26 having equal sized pixels, when an image would be displayed across the two displays (having different resolutions as disclosed by Reddy), the image would be displayed at different resolutions in the two displays, and would not be continuous as viewed by a viewer because neither Reddy nor Gennetten disclose any rescaling or size adjustment of an image in order to match image portions across two displays having different resolutions. While Gennetten discloses images displayed across two displays, Gennetten's displays are of equal resolution and thus no structure is disclosed, or needed, by Gennetten to resize or scale a portion of an image displayed across two displays.

Further, the Office Action, in asserting that modifying Reddy by the disclosure of Gennetten will result in all of the claimed features of independent claims 1, 11 and 22 is alleging that the applied references disclose or suggest the feature of displaying an image in a

continuous fashion across two displays having different resolution, and thus is alleging something the applied references do not disclose or suggest as discussed above. Thus, the Office Action is using Applicant's own disclosure in impermissible hindsight.

For the foregoing reasons, Applicant requests withdrawal of the rejections.

**II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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